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Attorneys for HAMMER & STEEL, INC. and

LISA GASSER

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JAMES SCHRECKENGOST, an individual,

Plaintiff,

vs.

HAMMER & STEEL, INC., a Missouri
corporation; LISA GASSER, an individual;
and DOES 1-10, inclusive,

Defendants.

CASE NO.

**DECLARATION OF THILINI
COLDAGELLI IN SUPPORT OF
DEFENDANTS' NOTICE OF REMOVAL
OF ACTION UNDER 28 U.S.C. § 1441(b)
(DIVERSITY)**

Action Filed: February 11, 2021

Trial Date: None Set

I, Ms. Thilini Coldagelli, CPA, declare as follows:

1. I am the Assistant Controller for Defendant HAMMER & STEEL, INC. ("H&S") and have served in that capacity since July 22, 2020. I have personal knowledge of the following facts, and if called upon to testify as to the matters stated herein, I could and would competently do so.

2. H&S is a Missouri Corporation originally formed in 1989 under its former name MVE Steel and Equipment Company, Inc.

3. On May 4, 1989, MVE Steel and Equipment Company, Inc. filed Articles of Incorporation with the state of Missouri.

4841-8138-9282.1

4. On February 28, 1994, MVE Steel and Equipment Company, Inc. filed an Amendment of Articles of Incorporation changing the entity name from MVE Steel and Equipment Company, Inc. to Hammer & Steel, Inc.

5. H&S is still incorporated in Missouri and is an active corporation in Missouri.


6. H&S' headquarters are located in Hazelwood, Missouri.

7. H&S' high level officers direct, control and coordinate its operations and activities from Hazelwood, Missouri.

8. Plaintiff JAMES SCHRECKENGOST was employed with H&S from September 4, 2018 through July 29, 2019.

9. At the time of Plaintiff's resignation, his hourly rate was \$ 20.00.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on March 26, 2021, Hazelwood, Missouri.



Ms. Thilini Coldagelli, CPA